

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to PREPA.**

ORDER GRANTING THREE HUNDRED FIFTY-NINTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE PUERTO RICO ELECTRIC POWER AUTHORITY TO CLAIMS ASSERTING DUPLICATE LIABILITIES

Upon the *Three Hundred Fifty-Ninth Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Claims Asserting Duplicate Liabilities* [ECF No. 17099] (the “Three Hundred Fifty-Ninth Omnibus Objection”),<sup>2</sup> filed by the Puerto Rico Electric Power Authority (“PREPA”), dated August 3, 2021, for entry of an order disallowing in their entirety

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Fifty-Ninth Omnibus Objection.

certain claims filed against PREPA, as more fully set forth in the Three Hundred Fifty-Ninth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Fifty-Ninth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Fifty-Ninth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Three Hundred Fifty-Ninth Omnibus Objection (collectively, the “Claims to Be Disallowed”) being duplicative of the claims identified in the column titled “Remaining Claims” in Exhibit A (collectively, the “Remaining Claims”); and the Court having determined that the relief sought in the Three Hundred Fifty-Ninth Omnibus Objection is in the best interests of PREPA, its creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Fifty-Ninth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Three Hundred Fifty-Ninth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Fifty-Ninth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors’ right to object to the Remaining Claims is reserved; and it is further

ORDERED that Prime Clerk is authorized and directed to delete the Claims to Be Disallowed from the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 17099 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Three Hundred Fifty-Ninth Omnibus Objection**

## THREE HUNDRED FIFTY-NINTH OMNIBUS OBJECTION

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## Exhibit A – Substantive Duplicate Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT
1 BANCO POPULAR DE PUERTO RICO LEGAL DIVISION (745) PO BOX 362708 SAN JUAN, PR 00936	5/29/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	20267	\$30,921.84	BANCO POPULAR DE PUERTO RICO LEGAL DIVISION (745) PO BOX 362708 SAN JUAN, PR 00936	5/29/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	166330	\$30,921.84
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									
2 DEYA ELEVATOR SERVICE GPO BOX 362411 SAN JUAN, PR 00936-2411	5/29/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	34133	\$48,433.39	DEYA ELEVATOR SERVICE GPO BOX 362411 SAN JUAN, PR 00936-2411	5/21/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	13775	\$70,583.92
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									
3 FREIRIA GARRATON, MARIA M PO BOX 36-4165 SAN JUAN, PR 00936-4165	4/18/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	7690	\$475,000.00	FREIRIA GARRATON, MARIA M PO BOX 36-4165 SAN JUAN, PR 00936-4165	4/18/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	7964	\$475,000.00
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									
4 GARY R ANDERSON TRUST U/A 10/25/10 GARY R ANDERSON, TRUSTEE PO BOX 444 NEW LONDON, NH 03257	4/2/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	5903	\$55,000.00	GARY R ANDERSON TRUST U/A 10/25/10 GARY R ANDERSON, TRUSTEE PO BOX 444 NEW LONDON, NH 03257	4/2/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	5593	\$105,000.00
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									
5 GARY R ANDERSON TRUST U/A 10/25/10 PO BOX 444 NEW LONDON, NH 03257	4/2/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	5971	\$50,000.00	GARY R ANDERSON TRUST U/A 10/25/10 PO BOX 444 NEW LONDON, NH 03257	4/2/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	5593	\$105,000.00
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									
6 IEH AUTO PARTS LLC DBA AUTO PLUS AUTO PARTS GARRETT A. NAIL TWO ALLIANCE CENTER 3560 LENOX ROAD, SUITE 1600 ATLANTA, GA 30326	6/28/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	75872	\$10,169.73	IEH AUTO PARTS LLC DBA AUTO PLUS AUTO PARTS GARRETT A. NAIL TWO ALLIANCE CENTER 3560 LENOX ROAD, SUITE 1600 ATLANTA, GA 30326	6/28/2028	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	70143	\$10,169.73
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									

\* - Indicates claim contains unliquidated and/or undetermined amounts.

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NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT
7 IEH AUTO PARTS LLC DBA AUTO PLUS AUTO PARTS GARRETT A. NAIL TWO ALLIANCE CENTER 3560 LENOX ROAD, SUITE 1600 ATLANTA, GA 30326	6/28/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	81938	\$10,169.73	IEH AUTO PARTS LLC DBA AUTO PLUS AUTO PARTS GARRETT A. NAIL TWO ALLIANCE CENTER 3560 LENOX ROAD, SUITE 1600 ATLANTA, GA 30326	6/28/2028	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	70143	\$10,169.73
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									
8 IEH AUTO PARTS LLC DBA AUTO PLUS AUTO PARTS GARRETT A. NAIL TWO ALLIANCE 3560 LENOX ROAD, SUITE 1600 ATLANTA, GA 30326	6/28/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	76191	\$10,169.73	IEH AUTO PARTS LLC DBA AUTO PLUS AUTO PARTS GARRETT A. NAIL TWO ALLIANCE 3560 LENOX ROAD, SUITE 1600 ATLANTA, GA 30326	6/28/2028	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	70143	\$10,169.73
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									
9 LLAUGER, JORGE VALDES (ON BEHALF OF HIMSELF AND ALL OTHERS SIMILARLY SITUATED) HAGENS BERMAN SOBOL SHAPIRO LLP 455 N CITYFRONT PLAZA DRIVE, SUITE 2410 CHICAGO, IL 60611	6/22/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	48936	Undetermined*	ANNE CATESBY JONES, ON BEHALF OF HERSELF AND ALL OTHERS SIMILARLY SITUATED HAGENS BERMAN SOBOL SHAPIRO LLP 455 N CITYFRONT PLAZA DRIVE, SUITE 2410 CHICAGO, IL 60611	6/22/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	48925	Undetermined*
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									
10 ORTIZ RAMIREZ DE ARELLANO, 4/20/2018 CECILE WASHINGTON 65 CONDADO SAN JUAN, PR 00907-2106	4/20/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	6039	\$210,000.00	ORTIZ RAMIREZ DE ARELLANO, 4/18/2018 CECILE WASHINGTON 65 CONDADO SAN JUAN, PR 00907-2106	4/18/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	6252	\$210,000.00
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									
11 ORTIZ RAMIREZ DE ARELLANO, 4/20/2018 CECILE WASHINGTON 65 CONDADO SAN JUAN, PR 00907-2106	4/20/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	6041	\$210,000.00	ORTIZ RAMIREZ DE ARELLANO, 4/18/2018 CECILE WASHINGTON 65 CONDADO SAN JUAN, PR 00907-2106	4/18/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	6252	\$210,000.00
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									

\* - Indicates claim contains unliquidated and/or undetermined amounts.

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NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER/ DEBTOR	CLAIM #	CLAIM AMOUNT
12 Riestra Fernandez, Miguel 675 Calle Sergio Cuevas Bustamante APT 2001 Torre del Cardenal San Juan, PR 00918	5/30/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	46196	Undetermined*	Riestra Fernandez, Miguel 675 Calle Sergio Cuevas Bustamante APT 2001 Torre del Cardenal San Juan, PR 00918	4/18/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	10490	Undetermined*
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									
13 Rios Morales, Awilda HC-57 Box 11030 Aguada, PR 00602	10/8/2020	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	176645	\$2,933.07	Rios Morales, Awilda HC-57 Box 11030 Aguada, PR 00602	5/31/2018	PUERTO RICO ELECTRIC POWER AUTHORITY 17-03283	17141	\$2,933.07
Reason: Proof of Claim asserts liabilities which are duplicative of liabilities asserted in another filed Proof of Claim.									

\* - Indicates claim contains unliquidated and/or undetermined amounts.